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Transmitted via E-Mail

December 22, 2006

Sam Chummar
Remedial Project Manager
USEPA Region 5
Superfund Division
Remedial Response Section #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Re: Georgia-Pacific Corporation Time Critical Removal Action Monthly Progress Report #1
BBL Project #: 66105.001

Dear Mr. Chummar:

Attached is the first monthly progress report for the Time Critical Removal Action (TCRA) at the Georgia-Pacific Corporation (Georgia-Pacific) Kalamazoo Mill Property and the former Hawthorne Mill Property (collectively referred to as the Mill Properties). The Mill Properties are associated with the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This report has been prepared pursuant to the Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-'07-C-858, and covers activities from November 27th through December 15th 2006.

If you have any questions, please do not hesitate to contact us.

Sincerely,

BLASLAND, BOUCK & LEE, INC.



Patrick N. McGuire
Associate

KWC/tld

cc: Eileen L. Furey, Esq., USEPA – Region 5
J. Michael Davis, Esq., Georgia-Pacific Corporation
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation
Keith M. Krawczyk, MDEQ-RRD-Superfund
Matthew Bowman, Blasland, Bouck & Lee Environmental Services, Inc.
Christie Sobol, Blasland, Bouck & Lee, Inc.

**Monthly Progress Report for the Georgia-Pacific Corporation Time Critical Removal Action
Report #1, December 26, 2006**

I. Significant Developments

Actions Performed

- On November 27, mobilized equipment, materials, and labor to the site;
- Completed site preparation activities at the Oxbow Area and A-Site;
- On November 27, began air and dust monitoring programs, in accordance with the Time Critical Removal Action (TCRA) Work Plan;
- Paint filter tests were conducted on wet soil at the Oxbow Area during rain conditions – no free liquid was observed during the tests;
- From November 27 to December 15, excavated approximately 8,580 cubic yards (cy) of soils/residuals, and tree stumps/root masses from the Oxbow Area and consolidated at A-Site;
- Performed consolidation and grading activities at A-Site;
- On December 6, the United States Environmental Protection Agency (USEPA) and the Michigan Department of Environmental Quality (MDEQ) were informed of upcoming sampling activities;
- At the Oxbow Area a global positioning system (GPS) survey was conducted to define the limits of excavation and to establish the verification sampling grid. Consistent with the TCRA Work Plan, sampling locations were then selected;
- On December 12, 2006 verification soil sampling within a portion of the area of excavation at the Oxbow Area was conducted, and samples sent to Severn Trent Laboratories for polychlorinated biphenyls (PCB) analysis with twenty percent of the verification samples selected for Target Compound List/Target Analyte List [TCL/TAL] constituents analysis;
- On December 14, a map depicting the verification sampling grid and sampling locations was submitted to USEPA;
- Cleaned public roads during material transport, as necessary;
- Pursuant to the AOC, Section XII, Applicable or Relevant and Appropriate Requirements have been identified for the TCRA (a draft list is provided in Table 1);
- Began site preparation of the Refuse Area for residual/soil removal activities, and installed soil/sedimentation controls (i.e., silt fence);
- Weather conditions were monitored daily to anticipate potential inclement weather;
- On December 13, 2006 BBL proposed the use of fly-ash to stabilize saturated soil at the A-Site; and
- On December 15, 2006 MDEQ denied the request to use fly-ash as a stabilizing agent.

Problems Encountered

- Saturated residuals/soils at the Oxbow Area and A-Site have reduced production; Class II sand was transported to A-Site and the Oxbow Area to help with stabilization of saturated material.

Analytical Data Received

- Analytical data for the air samples (taken three times daily, in accordance with the TCRA Work Plan) will be reported upon completion of the data validation process in subsequent monthly progress reports. However, all non-validated results are below the criteria set forth in the TCRA Work Plan. A summary of the air samples submitted for analysis is presented in Table 2.

**Monthly Progress Report for the Georgia-Pacific Corporation Time Critical Removal Action
Report #1, December 26, 2006**

- Analytical data for the verification soil sampling conducted during this reporting period will be reported upon completion of the data validation process in subsequent monthly progress reports. However, non-validated data results are all non-detect for PCB. A summary of the verification soil samples submitted for analysis is presented in Table 3.

II. Developments Anticipated

Schedule of Actions to be Performed

- Continue to excavate, load, and transport residuals/soils from the Oxbow Area to A-Site;
- Continue to consolidate and grade material relocated to A-Site;
- Continue air and dust monitoring programs;
- Continue to excavate, load, and transport residuals/soils from the Refuse Area;
- Continue soil verification sampling at the Oxbow Area; and
- Begin turbidity monitoring of the Kalamazoo River 100 feet upstream and downstream of the Refuse Area.

Anticipated Problems

- It is anticipated that materials at A-Site will continue to require stabilization.

Planned Resolutions of Past or Anticipated Problems

- BBL Environmental Services, Inc. is working with Terra Contracting L.L.C. to identify other stabilization agents to mix with saturated materials encountered at A-Site.

TABLE 1

**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE**

**TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES**

COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
FEDERAL CHEMICAL-SPECIFIC ARARs AND TBCs				
Clean Water Act (CWA)	40 CFR 131 EPA 440/5-86/001 "Quality Criteria for Water – 1986"	Criteria for protection of aquatic life and/or human health depending on designated water use.	ARAR	Applicable for assessing water quality in the vicinity of the Mill properties.
	40 CFR 136 40 CFR 122	Establishes monitoring requirements for the discharge of waste treatment effluent to the waters of the United States.	ARAR	Applicable for excavation and dewatering of residuals.
Federal Water Pollution Control Act – Toxic Pollutant Effluent Standards	40 CFR 129	Establishes effluent standard for toxic compounds including PCB (40 CFR 129.105). Applies to discharges to navigable waters.	ARAR	Applicable to discharge of water to the Kalamazoo River or Davis Creek.
Toxic Substances Control Act (TSCA)	40 CFR 761.61	PCB Remediation Waste Rule establishing risk-based disposal methods for PCB remediation waste.	ARAR	Residuals contain PCB greater than 50 mg/kg.
EPA 540/G-90/007	OSWER Directive 9355.4-01	Guidance on remedial actions for Superfund sites with PCB contamination.	TBC	May be used as a guideline for handling PCB-containing residuals.
Michigan Public Act 451, Part 31 - Water Resources Protection	MCL 324.3109	Prohibits direct or indirect discharge of a substance that is injurious to public health, recreational use, or aquatic life.	ARAR	Any remedial action that results in the unacceptable discharge of injurious substances will not be considered effective or complete.

TABLE 1

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SUPERFUND SITE**

**TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES**

COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
STATE CHEMICAL-SPECIFIC ARARs AND TBCs				
Michigan Public Act 451, Part 31 - Water Resources Protection (Continued)	MAC 323.1201-1221 (Part 8 Rules)	In accordance with federal WPCA and CWA, established chemical- specific water quality-based effluent limits (WQBELs) for point- source discharges.	ARAR	Part 201 requires that remedial actions comply with Part 31 and its promulgated rules. Criteria are applicable to discharge associated with implementing removal action.
	MAC 323.2153 MAC 323.1041-1116 MAC 323.1201-1221	Establishes effluent standards in accordance with federal WPCA and CWA; establishes rules specifying standards for several water quality parameters.	ARAR	Applicable for assessing water quality in the Mill properties.
CERCLA	42 USC 9601 et seq.: Section 121	Requires selection of a remedial action that is protective of human health and the environment.	ARAR	The Time Critical Removal Action is being conducted under CERCLA guidance.
CWA	40 CFR 230	Guidelines to restore and maintain the chemical, physical, and biological integrity of waters of the United States by controlling discharge of fill material.	TBC	Guidelines may be followed for placement or disposal of fill into the floodplain or wetland.
	40 CFR 232	Requirements for placement of fill.	ARAR	Substantive requirements of Section 404 permit must be met.

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COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
FEDERAL ACTION/LOCATION-SPECIFIC ARARs AND TBCs				
CWA – Discharge to Waters of the United States (NPDES)	40 CFR 122 40 CFR 125 40 CFR 403	Establishes site-specific pollutant limitations and performance standards, which are designed to protect surface water quality.	ARAR	May be relevant and appropriate for removal activities, which treat and/or discharge water back to the Kalamazoo River.
USEPA – Executive Orders: 11990 - Protection of Wetlands 11988 - Floodplain management.	40 CFR 6.302 40 CFR 6, Appendix A; OSWER 9280.0-03	Requires federal agencies, where possible, to avoid or minimize adverse impacts of federal actions upon wetlands/floodplains and enhance natural values of such.	ARAR	Executive orders affect any work conducted in floodplains or wetlands.
RCRA	40 CFR 257	Establishes the regulations regarding criteria for classification of solid waste disposal facilities and practices.	ARAR	Material containing PCB will be removed from the site and disposed at a licensed landfill.
TSCA	40 CFR 761	Provides regulations for storage and disposal of materials containing PCB.	ARAR	Residuals contain PCB greater than 50 mg/kg.
Water Quality Standards	40 CFR 131	State-specific ARARs for surface water quality.	ARAR	State-specific ARARs will govern if more stringent than federal ARARs.
Clean Air Act (CAA)	40 CFR 52 40 CFR 50	Establishes requirements for constituent emission rates in accordance with National Ambient Air Quality Standards (NAAQS).	ARAR	Air monitoring is being conducted during relocation of residuals and excavation/removal of residual/soil.

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COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
USDOT Placarding and Handling	40 CFR 171	Transportation and handling requirements for materials containing PCB with concentrations of 20 mg/kg or more.	ARAR	This will apply when residuals are removed from the site and disposed at off-site landfill.
Occupational Safety and Health Act – Hazardous Waste Operations and Emergency Response	29 CFR 1910.120	Establishes health and safety requirements for cleanup operations at sites on the National Priorities List	ARAR	Applies to the protection of on-site workers.
Michigan Public Act 451, Part 201 - Environmental Remediation	MCL 324.20118(2) MCL 324.20120a MAC 299.5705	Requires that a remedial action shall provide for response activity that will satisfy cleanup criteria.	ARAR	The removal action will meet generic cleanup criteria for industrial site.
	MCL 324.20120a MAC 299.5708	If the target detection limit or background concentration is greater than the risk-based cleanup criteria, the target detection limit or background concentration shall be used instead of the risk-based cleanup criterion.	ARAR	Applicable to water treatment.
	MCL 324.2017a MCL 324.20114	Requirements for owner of a facility, such as preventing exacerbation of and exercising due care.	ARAR	Applicable because material is being consolidated at A-Site.

TABLE 1

**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE**

**TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES**

COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
STATE ACTION/LOCATION-SPECIFIC ARARs and TBCs				
Michigan Public Act 451, Part 201 - Environmental Remediation (Continued)	MAC 299.5520 MAC 299.51003-51005	Objectives of response activities, determination (or nullification) that a response activity is complete	ARAR	When the response action is complete, the entity initiating the action has the burden of demonstrating that the action meets all requirements.
	MAC 299.5522 MAC 299.51017	Liable parties must provide notice to the department and adjacent land owners in certain situations, such as if hazardous substances emanate beyond the property boundary.	ARAR	Applicable if there is a release (above criteria) from the site.
Michigan Public Act 451, Part 91 – Soil Erosion and Sediment Control	MCL 324.9112 MCL 324.9116 MAC 323.1701-1714	Establishes rules prescribing soil erosion and sedimentation control plans, procedures, and measures. Establishes requirements for owners of land undergoing an earth change.	ARAR	If work is conducted in off-site floodplain areas, a soil erosion and sediment control plan and/or permit may be required to perform earth changes. Substantive requirements of permit must be met.
Michigan Public Act 451, Part 31 – Water Resources Protection	MCL 323.2204-2207 MCL 323.2106 MCL 323.2211 MCL 323.220	Establishes the rules regarding water and wastewater discharge provisions for the non-degradation of groundwater quality, uses of groundwater, and the use and management of containers at hazardous waste facilities.	ARAR	Removal activities may require either discharge of waters to the Kalamazoo River and/or management of waste containers.

TABLE 1

**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE**

**TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES**

COMPLIANCE WITH FEDERAL AND STATE ARARs AND TBCs

Regulation	Citation	Description	ARAR/TBC	Rationale
Michigan Public Act 451, Part 31 – Water Resources Protection (Continued)	MCL 324.3112	Prohibition of discharge waste or waste effluent into surface water.	ARAR	Removal activities may involve discharge of waters to the Kalamazoo River. Substantive requirements of a NPDES permit must be attained.
	MCL 324.3109b	Defines when Part 31 remedial obligations are satisfied.	TBC	For any remedial alternative meeting the requirements of Part 201, Part 31 requirements are satisfied.
	MCL 324.3108	Prohibits filling or grading of a floodplain, unless permitted by the state.	ARAR	Removal action involves excavation and backfilling below the 100 year flood elevation.
Michigan Occupational Safety and Health Act, Act 154 of 1974	Act 154 of 1974 as amended (Parts 1-49)	Establishes the rules for safety standards in the workplace.	ARAR	Applies to worker safety.
Michigan Public Act 451, Part 55 – Air Pollution Control	MAC 336.1101-2706	Establishes rules prohibiting the emission of air contaminants in quantities which cause injurious effects to human health, animal life, plant life or significant economic value, and/or property.	ARAR	Air monitoring will be performed during removal activities.

TABLE 2**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE****TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES****SUMMARY OF AIR MONITORING SAMPLES SUBMITTED FOR ANALYSIS**

SAMPLE ID	SAMPLE COLLECTION DATE
AST-PUF-PRE	11/17/06
HWY-PUF-PRE	11/17/06
AST-PUF-001	11/28/06
HWY-PUF-001	11/28/06
BKG-PUF-001	11/28/06
AST-PUF-002	11/29/06
HWY-PUF-002	11/29/06
BKG-PUF-002	11/29/06
AST-PUF-003	11/30/06
HWY-PUF-003	11/30/06
BKG-PUF-003	11/30/06
AST-PUF-004	12/1/06
HWY-PUF-004	12/1/06
BKG-PUF-004	12/1/06
AST-PUF-005	12/2/06
HWY-PUF-005	12/2/06
BKG-PUF-005	12/2/06
AST-PUF-007	12/6/06
HWY-PUF-007	12/6/06
BKG-PUF-007	12/6/06
AST-PUF-008	12/7/06
HWY-PUF-008	12/7/06
BKG-PUF-008	12/7/06
AST-PUF-009	12/8/06
HWY-PUF-009	12/8/06
BKG-PUF-009	12/8/06
AST-PUF-010	12/9/06
HWY-PUF-010	12/9/06
BKG-PUF-010	12/9/06
G53018	12/12/06
G53019	12/12/06
G53020	12/12/06
G53030	12/13/06
G53031	12/13/06
G53032	12/13/06
	12/14/06
	12/14/06
	12/14/06
	12/15/06
	12/15/06
	12/15/06

TABLE 3

**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE**

**TIME CRITICAL REMOVAL ACTION
KALAMAZOO MILL AND FORMER HAWTHORNE MILL PROPERTIES**

SUMMARY OF VERIFICATION SOIL SAMPLES SUBMITTED FOR ANALYSIS

SAMPLE ID	SAMPLE COLLECTION DATE
G53021	12/12/06
G53022	12/12/06
G53023	12/12/06
G53024	12/12/06
G53025	12/12/06
G53026	12/12/06
G53027	12/12/06
G53028	12/12/06
G53029	12/12/06